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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SAVE OUR FOREST ASSOCIATION, INC.,

Plaintiff,

V.

UNITED STATES FOREST SERVICE,
et al.,

Federal Defendants,

and

YUHAAVIATAM OF SAN MANUEL NATION, a federally recognized Indian tribe, also federally recognized as SAN MANUEL BAND OF MISSION INDIANS,

Defendant-Intervenor.

Case No. 5:24-cv-01336-JGB-DTB

**STIPULATION TO VACATE
HEARINGS NOTICED FOR
NOVEMBER 24, 2025**

Hearing Date: November 24, 2025

Hearing Time: 9:00 AM

Courtroom: Riverside Courtroom 1

Judge: Hon. Jesus G. Bernal

Action Filed: June 25, 2024

1 WHEREAS, on October 6, 2025, Federal Defendants filed an Unopposed Ex
2 Parte Application for a Stay Pending Lapse in Appropriations (ECF No. 78),
3 noting that, due to the lapse in appropriations, counsel for the United States and
4 employees for Federal Defendants had been forced to cease work on preparing for
5 upcoming events in this case but “[t]he Parties agree that the filing of [Defendant-
6 Intervenor’s] motion to dismiss should be excepted from the stay, and that only the
7 subsequent briefing of it should be stayed,” ECF No. 78 at 2;

8 WHEREAS, on October 9, 2025, Defendant-Intervenor Yuhaaviatam of San
9 Manuel Nation (“the Nation”) noticed its Motion to Dismiss for November 24,
10 2025 at 9:00 am (ECF No. 79);

11 WHEREAS, on October 20, 2025, Plaintiff Save our Forest Association, Inc.
12 (“SOFA”) noticed its Motion to Complete the Administrative Record for
13 November 24, 2025 at 9:00 am (ECF No. 81);

14 WHEREAS, SOFA and the Nation have not opposed Federal Defendants’
15 Ex Parte Application for a stay pending restoration of appropriations to the
16 Department of Justice and Department of Agriculture, and the lapse in
17 appropriations prejudices Federal Defendants’ ability to fully and properly respond
18 to the other Parties’ motions noticed for hearing on November 24, 2025;

19 NOW THEREFORE, the Parties hereby stipulate and agree, and request that
20 the Court enter an order vacating the two hearings currently noticed for November
21 24, 2025 (ECF Nos. 79 & 81) and associated briefing deadlines, *see* L.R. 7-11, and
22 directing the Parties to confer and notice new hearing dates within 7 days of
23 Congress appropriating funds for the Departments. The Parties agree that
24 opposition brief(s) to both motions shall be due four weeks prior to the hearing
date and reply brief(s) shall be due two weeks prior to such date.

1 Respectfully submitted on October 31, 2025.
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4 By: /s/ Rachel S. Doughty (with permission)
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23 /s/ Frank R. Lawrence (with permission)

24 *Counsel for Intervenor-Defendant*

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will automatically send email notification to the attorneys of record.

/s/ Emma L. Hamilton
Emma L. Hamilton
U.S. Department of Justice